

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

Mr. Robert F. Bauer Mr. Marc E. Elias Mr. Graham M. Wilson Perkins Coie 700 13th Street, NW Suite 600 Washington, DC 20005-3960

MAR 2 2 2018

RE:

MUR 6916

The Democratic National Committee and Andrew Tobias in his official capacity as

treasurer ("the Committee")

Dear Messrs. Bauer, Elias & Wilson:

On March 2, 2015, the Federal Election Commission notified your client, the Committee, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On March 15, 2016, the Commission found, on the basis of the information in the complaint, and information provided by multiple respondents, that there is no reason to believe the Committee violated 52 U.S.C. §§ 30116, 30118, or 30119 by making or receiving prohibited in-kind contributions in the form of data and analytical tools, no reason to believe the Committee violated 52 U.S.C. §§ 30116 or 30118 by making or receiving prohibited or excessive in-kind contributions in the form of coordinated communications, and no reason to believe the Committee violated 52 U.S.C. § 30125 by soliciting, receiving, or directing contributions, donations, transfers of funds, or any other thing of value not subject to the prohibitions, limitations, and reporting requirements of the Act. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009). The Factual and Legal Analysis, which explains the Commission's findings, is enclosed for your information.

If you have any questions, please contact Meredith McCoy, the attorney assigned to this matter at (202) 694-1650.

Sincerely,

Peter G. Blumberg

Assistant General Counsel

Enclosure: Factual and Legal Analysis